



HYGIENETECH

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September 9, 2008

State of California
Board of Equalization
450 N Street
Sacramento, California 94279

Document No. 20809001.1

Attention: David J. Gau

Regarding: Mold Growth Abatement Area Clearance Criteria

Dear Mr. Gau:

This morning, I received your message that DGS intends to have their abatement contractor remove the mold growth abatement enclosures from areas that had surface test results (by the tape lift method) showing some degree of settled *marker* mold spores. Be advised that I disagree with the position of DGS (and apparently their consultants) on this matter. I offer the following for clarification.

- Under any predictable circumstances, copious quantities of airborne spores are generated at various phases of mold growth abatement work and consequently, following gross removal of mold-colonized materials, detail cleaning of all remaining surfaces in abatement enclosures is typically done. Certainly for years, that has been the standard in the industry.
- Following completion of such detail cleaning, the standard method to verify the effectiveness of those procedures is to sample selected representative surfaces using the tape lift method. Note that if, following analysis, no evidence of *marker* molds is found on those surfaces, and if the analytical results do not suggest that one or more of the surfaces sampled continues to be colonized by fungi, then the detail cleaning procedures are deemed to have been adequate.
- Note that if in such circumstances, post-detail cleaning surface samples are not collected at the time of clearance, then the involved parties cannot state with any degree of confidence that the detail cleaning procedures were adequate. For this reason, the failure to collect surface samples falls below the standard in the industry.
- If in such circumstances, surface samples are collected and the results show that settled *marker* mold spores remain on surfaces, then additional detail cleaning should be performed by the contractor until additional surface clearance data show that reasonable efforts to decontaminate surfaces have been completed.
- The failure to thoroughly detail clean an abatement environment will increase the potential for persons entering that space to be exposed to airborne and surface mold spores and/or hyphal fragments. And, be advised that mold spores, even those rendered non-viable during abatement when biocides are used, are considered allergens. Therefore, persons having specific allergies to those entities may experience ill effects upon exposure.



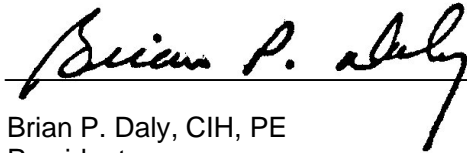
Fortunately, such an increased exposure potential and the associated ill effects can easily be avoided if proper detail cleaning procedures are completed and verified. And, fortunately, clearance air and surface samples are easily and quickly collected, and results are often received within eight hours after receipt at the laboratory. Note also that the analytical fees, particularly those associated with tape lift samples, are modest.

In addressing the specific action plan by DGS noted above, I recommend that a typical clearance survey (that includes tape lift sampling) be performed in all areas and that acceptable data be recorded prior to dismantling of the abatement enclosures. Regarding any area in which previously recorded tape lift data suggested that additional detail cleaning was in order, I would recommend that the abatement contractor exercise reasonable efforts to detail clean those surfaces that they believe have the highest potential for deposition of settled spores. Note that HygieneTech is not suggesting that all surfaces in each of those enclosures be detail cleaned. Once the contractor has re-cleaned the surfaces that they have selected, we will make ourselves available to complete a follow-up clearance survey promptly.

If you have any comments or questions regarding these or other matters related to this project, please do not hesitate to contact me directly at (310) 370-8370.

Sincerely,

HYGIENE TECHNOLOGIES INTERNATIONAL, INC.



Brian P. Daly, CIH, PE
President